

EXHIBIT “A”



**IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA**

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

1. LISA DODSON,

FILED

Plaintiff,

JUN 21 2018

v.

Case No. CJ-18- 806 TB

1. AMERICA'S POWERSPORTS, INC.,
Defendant.

In the office of the
Court Clerk MARILYN WILLIAMS

JURY TRIAL DEMANDED
ATTORNEY LIEN CLAIMED

PETITION

COMES NOW THE PLAINTIFF, Lisa Dodson, and pleads her claims as follows:

PARTIES

1. The Plaintiff is Lisa Dodson, an adult resident of Oklahoma County, Oklahoma.
2. The Defendant is the America's Powersports, Inc., a foreign for-profit corporation doing business in Cleveland County, Oklahoma.

VENUE

3. Plaintiff's claims are for disability discrimination in violation of the Americans with Disabilities Act (ADA) and Oklahoma's Anti-Discrimination Act (OADA); and for gender discrimination, including retaliation after Plaintiff opposed gender discrimination and assisted another in her complaints of discrimination, in violation of Title VII of the Civil Rights Act of 1964 and the OADA.
4. Some of the conduct giving rise to this litigation occurred in Cleveland County, Oklahoma, such that venue is proper in Cleveland County, Oklahoma.

STATEMENT OF FACTS

5. The Defendant employed at least fifteen employees for at least twenty weeks of the current or proceeding year, such that it is an employer subject to the ADA and Title VII. There is no minimum employee requirement to proceed under the OADA.
6. Plaintiff was employed by the Defendant from around July 1, 2016, until she was involuntarily terminated around October 6, 2017.
7. During all periods the Plaintiff was qualified for her job and performed satisfactorily.
8. Additionally, the Plaintiff is disabled in that she suffers from lupus and related conditions which, without regard to the ameliorative effects of mitigating measures, substantially limits one or more major life activities (including major bodily functions) including cell function, immune function and kidney function.
9. At least for the reasons set out in para. 8, the Plaintiff is disabled in that she has an actual disability, a record of a disability, and/or the Defendant perceives the Plaintiff as being disabled.
10. Plaintiff underwent a kidney transplant around 2002 and requires ongoing medical treatment related to lupus and the kidney transplant.
11. During Plaintiff's employment, Robert Dodson (Chief Operating Officer) sexually harassed an employee, described herein as W.B. Examples of the sexual harassment include Mr. Dodson conditioning W.B.'s ability to receive a promotion upon receiving sexual favors.

12. Around April 2017, the Plaintiff reported Mr. Dodson's sexual harassment to multiple supervisors, including Bill Coulter (Owner) and Blake Lawson (CFO).
13. In response to Plaintiff telling Mr. Coulter that she believed Mr. Dodson had sexually harassed W.B., Mr. Coulter said to Plaintiff that the conversation was "awkward" and asked whether Plaintiff planned "to continue working" for the Defendant. In response, Plaintiff said she requires significant treatment for a prior kidney transplant and that she needed to remain on Defendant's health insurance policy. Plaintiff told Mr. Coulter she needed to remain employed and on the Company's health insurance policy because the cost of her medical care related to the lupus and kidney transplant.
14. Around the end of April 2017, the Defendant transferred the Plaintiff to the facility in Moore, Oklahoma and required Plaintiff to perform her job duties either at the Moore, Oklahoma facility and/or Plaintiff's home, which is located in Oklahoma County, Oklahoma.
15. Around August 21, 2017 the Defendant learned that the Plaintiff had been in communication with W.B. and was assisting her in her complaint of sexual harassment against Mr. Dodson.
16. Plaintiff was terminated around October 6, 2017.
17. Mr. Dodson, the person who had engaged in the sexual harassment, was not terminated and is still employed by the Defendant.
18. As a direct result of the termination, the Plaintiff has suffered, and continues to suffer, wage loss (including back, present and front pay, along with the value of

benefits associated with such wages) and emotional distress/dignitary harm damages, including worry, frustration, sadness and similar unpleasant emotions.

19. At the least, significant factors in the decision to terminate the Plaintiff include her gender, retaliation for her reports of gender discrimination, and her assistance to the victim of gender discrimination, and/or her disability (including having an actual disability, a record of a disability and/or because the Defendant perceived the Plaintiff as being disabled).
20. The Plaintiff has exhausted her administrative remedies by timely filing an EEOC charge of discrimination on October 26, 2017. The EEOC issued Plaintiff a right to sue letter on May 23, 2018, and Plaintiff received such letter thereafter. This petition is timely filed within ninety (90) days of Plaintiff's receipt of her right to sue letter.

COUNT I

Plaintiff incorporates the above allegations and further pleads:

21. Discrimination on the basis of a disability (including actual, perceived, record of and/or association with a disabled person) is prohibited by the ADA and the OADA.
22. Under both the ADA and OADA, the Plaintiff is entitled to her wage loss (including back, present and front pay, along with the value of benefits associated with such wages).
23. Under the ADA Plaintiff is entitled to emotional distress damages.
24. Because the Defendant's conduct was willful or, at the least, in reckless disregard of Plaintiff's rights, she is entitled to punitive damages under the ADA.

25. Plaintiff is automatically entitled to liquidated damages under the OADA.

COUNT II

Plaintiff incorporates the above allegations and further pleads:

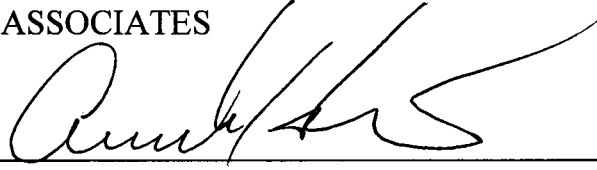
26. Discrimination on the basis of gender (including retaliation for reporting gender discrimination and assisting another in pursuing a claim of gender discrimination) violates Title VII and the OADA.
27. Under both Title VII and OADA, the Plaintiff is entitled to her wage loss (including back, present and front pay, along with the value of benefits associated with such wages).
28. Under Title VII Plaintiff is entitled to emotional distress damages.
29. Because the Defendant's conduct was willful or, at the least, in reckless disregard of Plaintiff's rights, she is entitled to punitive damages under Title VII.
30. Plaintiff is automatically entitled to liquidated damages under the OADA.

PRAYER

WHEREFORE, Plaintiff requests this Court enter judgment in her favor and against the Defendant, and grant her all compensatory damages suffered, together with all damages, liquidated damages, attorneys' fees, costs and interest, and such other legal and equitable relief as this Court deems just and proper.

RESPECTFULLY SUBMITTED THIS 12th DAY OF JUNE 2018.

HAMMONS, GOWENS, HURST
& ASSOCIATES

A handwritten signature in black ink, appearing to read 'Mark E. Hammons', is written over a horizontal line.

Mark E. Hammons, OBA No. 3784

Amber L. Hurst OBA No. 21231

325 Dean A. McGee Avenue

Oklahoma City, Oklahoma 73102

Telephone: (405) 235-6100

Email: amber@hammonslaw.com

JURY TRIAL DEMANDED

ATTORNEY LIEN CLAIMED



IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA
CITY OF OKLAHOMA
STATE OF OKLAHOMA

FILED

JUN 21 2018

1. LISA DODSON,

Plaintiff,

v.

1. AMERICA'S POWERSPORTS, INC.,

Defendant.

In the office of the
Court Clerk MARILYN WILLIAMS

Case No. CJ-18- 806 (TB)

ATTORNEY LIEN CLAIMED
JURY TRIAL DEMANDED

ENTRY OF APPEARANCE

COMES NOW Amber L. Hurst of Hammons, Gowens, Hurst & Associates, hereby enters her appearance as an attorney for the Plaintiff in the above captioned action. I certify that I am admitted to practice in this Court.

RESPECTFULLY SUBMITTED THIS 12th DAY OF JUNE, 2018.

HAMMONS, GOWENS & HURST
Amber L. Hurst, OBA No. 21231
325 Dean A. McGee Avenue
Oklahoma City, Oklahoma 73102
Telephone: (405) 235-6100
Facsimile: (405) 235-6111
Email: amber@hammonslaw.com



IN THE DISTRICT COURT OF CLEVELAND COUNTY

STATE OF OKLAHOMA
CLEVELAND COUNTY, S.S.

FILED

1. LISA DODSON,

JUN 21 2018

Plaintiff,

v.

In the office of the
Court Clerk MARILYN WILCOX No. CJ-18- 806 (TB)

1. AMERICA'S POWERSPORTS, INC.,

) ATTORNEY LIEN CLAIMED

) JURY TRIAL DEMANDED

Defendant.

ENTRY OF APPEARANCE

COMES NOW Kristin E. Richards of Hammons, Gowens, Hurst & Associates,
hereby enters her appearance as an attorney for the Plaintiff in the above captioned action.

I certify that I am admitted to practice in this Court.

RESPECTFULLY SUBMITTED THIS 12th DAY OF JUNE, 2018.

HAMMONS, GOWENS & HURST
Kristin E. Richards, OBA No. 33255
325 Dean A. McGee Avenue
Oklahoma City, Oklahoma 73102
Telephone: (405) 235-6100
Facsimile: (405) 235-6111
Email: kristin@hammonslaw.com



IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA
CLEVELAND COUNTY OF OKLAHOMA

FILED

1. LISA DODSON, JUN 21 2018)
Plaintiff,)
In the office of the)
Court Clerk MARILYN WILLIAMS)
v.) Case No. CJ-18- 806 (TB)
1. AMERICA'S POWERSPORTS, INC.,) ATTORNEY LIEN CLAIMED
Defendant.) JURY TRIAL DEMANDED

ENTRY OF APPEARANCE

COMES NOW Mark Hammons of Hammons, Gowens, Hurst & Associates, hereby enters his appearance as an attorney for the Plaintiff in the above captioned action. I certify that I am admitted to practice in this Court.

RESPECTFULLY SUBMITTED THIS 12th DAY OF JUNE, 2018.

HAMMONS, GOWENS & HURST
Mark Hammons, OBA No. 3784
325 Dean A. McGee Avenue
Oklahoma City, Oklahoma 73102
Telephone: (405) 235-6100
Facsimile: (405) 235-6111
Email: mark@hammonslaw.com
Counsel for Plaintiff



ORIGINAL
PLEASE RETURN

JUL 16 2018

IN THE DISTRICT COURT OF CLEVELAND COUNTY
STATE OF OKLAHOMA

In the office of the
Court Clerk MARILYN WILLIAMS

1. LISA DODSON,

Plaintiff,

v.

1. AMERICA'S POWERSPORTS, INC.,

Defendant.

Case No. CJ-18-806 (TB)

ATTORNEY LIEN CLAIMED
JURY TRIAL DEMANDED

SUMMONS

To: America's Powersports, Inc.
500 SW 11th Street
Moore, OK 73160

You have been sued by the above-named Plaintiff, and you are directed to file a written answer to the attached petition in the court at the above address within **twenty (20)** days after service of this summons upon you, exclusive of the day of service. Within the same time, a copy of your answer must be delivered or mailed to the attorney for the Plaintiff.

ISSUED THIS 21 DAY OF JUNE, 2018.



CLEVELAND COUNTY COURT CLERK

By [Signature]
Deputy Court Clerk

Attorney for Plaintiff:
HAMMONS, GOWENS, HURST & ASSOC.
Amber L. Hurst, OBA No. 21231
325 Dean A. McGee Avenue
Oklahoma City, Oklahoma 73102
Telephone: (405) 235-6100
Facsimile: (405) 235-6111

This summons was served on 7-6-18 via certified mail.

[Signature]
Signature of person serving summons

YOU MAY SEEK THE ADVICE OF AN ATTORNEY ON ANY MATTER CONNECTED WITH THIS SUIT OR YOUR ANSWER. SUCH ATTORNEY SHOULD BE CONSULTED IMMEDIATELY SO THAT AN ANSWER MAY BE FILED WITHIN THE TIME LIMIT STATED IN THE SUMMONS.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>	<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p>																
<p>1. Article Addressed to:</p> <p>America's Powersports, Inc 500 SW 11th Street Moore, OK 73160</p>	<p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>																
<p>2. Article Number (Transfer from service label)</p> <p>7016 0340 0001 1669 4051</p>	<p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery Restricted Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
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PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

USPS Tracking®**FAQs >** (<http://faq.usps.com/?articleId=220900>)**Track Another Package +****Tracking Number:** 70160340000116694051

Remove X

Expected Delivery on**FRIDAY****6**JULY
2018 ⓘ

by

8:00pm ⓘ **Delivered**July 6, 2018 at 11:55 am
Delivered, Left with Individual
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Go to our FAQs section to find answers to your tracking questions.

FAQs (<http://faq.usps.com/?articleId=220900>)